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March 5, 2014

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

**Subject:** Letter of Intent - FCC Rural Broadband Experiments

Dear Ms. Dortch:

Range Telephone Cooperative, Inc. (Range) is very interested in the FCC rural broadband experiments. Range serves as an incumbent local exchange carrier in southeastern Montana and northeastern Wyoming and has been providing communications services in these areas since 1953.

Although the Range service territory is sparsely populated, it has been able to provide broadband communications services in rural communities equal to those available in more densely populated areas. Range is actively expanding its optical fiber broadband network to provide higher broadband speeds and advanced services to remote areas outside of the small towns it serves. As an integrated part of the communities it serves, Range understands the positive impact that broadband communications has on economic development, health care services and higher education (just to name a few). Range also understands the challenges in providing broadband communications services in remote and sparsely populated areas.

**Proposed Service Area**

Range proposes to extend high speed broadband from its existing fiber network into currently unserved and underserved areas within the Northern Cheyenne Indian Reservation census tract (specific tract is listed at the bottom of this letter). This remote area is currently economically disadvantaged and in need of the broadband services that would be made available under the Range proposal.

To facilitate the extension of its existing broadband network, Range plans to partner with the Northern Cheyenne Tribe, the Bureau of Indian Affairs and other state and local agencies to secure the necessary permitting for fiber construction and wireless infrastructure placement. Range would also partner with current and future broadband

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access providers operating on the reservation to assure adequate access to backhaul infrastructure and competitive pricing to end users.

### **Critical Community Facilities**

The proposed broadband network will serve the following critical community facilities:

- Chief Dull Knife College (Lame Deer, MT)
- Dr. John Woodenlegs Memorial Library (Lame Deer, MT)
- St. Labre Indian School K-12 (Ashland, MT)
- One Elementary, One Junior High, One High School (Lame Deer, MT)
- Cheyenne Tribal School K-12 (Busby, MT)
- Tribal Education Department Adult Education & Job Training (Lame Deer, MT)
- Bureau of Indian Affairs Office (Lame Deer, MT)
- Multiple Tribal Government Offices (Lame Deer, MT)
- Lame Deer Medical Center (Lame Deer, MT)
- Community Center (Lame Deer, MT)

The Northern Cheyenne Indian Reservation also includes numerous small business entities that would benefit from higher speed broadband communications services.

Based upon the census data, the proposed area includes 1,400 occupied housing units.

### **Proposed Broadband Service Offerings**

Range offers a wide selection of broadband communications services including TDM and IP voice services, high speed Internet and access to video streaming services. These are available in various combinations with broadband speed offerings in multiple tiers ranging from minimal 1.5Mbps to 10Mbps (where supported). All services available through Range would be offered throughout the broadband experiment area. Following is a list of the Range broadband options and pricing:

1.5 Mbps download/512 kbps upload	\$34.95/mo
3.0 Mbps download/512 kbps upload	\$49.95/mo
6.0 Mbps download/512 kbps upload	\$64.95/mo
10.0 Mbps download/1.0 Mbps upload	\$79.95/mo
(SDSL) 2.0 Mbps download/2.0 Mbps upload	\$149.95/mo
(SDSL) 4.0 Mbps download/4.0 Mbps upload	\$249.95/mo

### **Proposed Technologies**

Range proposes to utilize Fiber To The Premise (FTTP) using Passive Optical Network (PON) and Active Ethernet (AE) for those last mile deployments that are adjacent to its existing fiber optic middle mile routes. Fiber trunked Broadband Loop Carrier sites would be installed to leverage existing short copper loop lengths using Asymmetrical Digital Subscriber Line (ADSL2+) and Very high bit rate Digital Subscriber Line (VDSL) technologies where applicable. 3.65GHz registered radio spectrum would be



used to deploy LTE and WiMAX broadband fixed wireless services to reach isolated subscribers beyond the economical reach of optical fiber facilities.

### **Local Support**

Range has received numerous requests from citizens and community leaders in the targeted project area to bring high speed broadband to the Northern Cheyenne Indian Reservation. As the new networks are being deployed, Range will hold community meetings to introduce the expanded broadband services to members of the Tribe, as well as provide broadband connectivity and computer resources for adult education, free Internet training classes, and other programs encouraging use of the deployed technologies.

### **Team**

Range plans to team up with the Bureau of Indian Affairs (BIA) and the Northern Cheyenne Tribe to leverage existing fiber infrastructure currently in place and to expedite the permitting process and to assure tribal members are fully aware of the proposed project and the benefits of a connected reservation.

### **Project Timeline and Cost**

The project timeline is directly related to FCC funding availability. Our goal is to begin installation and construction activities no later than the spring of 2015.

A high-level estimate of funds required to build out the network would be \$7,560,000 and Range would plan to contribute \$1,890,000. It would be our preference to utilize one-time funding from the FCC for the balance of \$5,670,000 rather than continuing funding.

Range has the capacity, experience, and capabilities to provide a ubiquitous high speed broadband network encompassing the Northern Cheyenne Indian Reservation and is appreciative of the opportunity provided under this program.

Sincerely,



Robin Stephens  
CEO and General Manager

### **Project Area Census Tracts/Blocks**

- Bighorn County, MT – Census Tribal Tract 9404 – N. Cheyenne Indian Reservation
- Rosebud County, MT - Census Tribal Tract 9404 – N. Cheyenne Indian Reservation